



Department of Justice (“DOJ”), including the U.S. Attorney’s Office for the District of Columbia (“DDC”).

4. As such, until DOJ determined whether prosecution was warranted, neither undersigned counsel nor agency counsel for the Department of Interior could conduct any investigation into the allegations of Plaintiffs’ complaint.

5. On the afternoon of November 14, 2019, DOJ and DDC announced that they would decline prosecution regarding the allegations in the instant action, thus only allowing undersigned counsel and agency counsel to investigate Plaintiff’s allegations as of late last week.

6. Because undersigned counsel has not yet had the opportunity to conduct or review any investigation into the allegations of Plaintiffs’ complaint, Defendant respectfully requests a limited two-week extension of time within which to file a responsive pleading. Additionally, undersigned counsel has a large number of other litigative demands due in a number of other matters contemporaneous with the current deadline to file a responsive pleading, which include five depositions this week, as well as a dispositive motion in an additional case due today (Tuesday, November 19, 2019), two dispositive motion briefs in two additional cases due Friday, November 22, 2019, and a dispositive motion in a fourth additional case due Monday, November 25, 2019. These litigative demands have greatly hampered undersigned counsel’s ability to investigate Plaintiff’s allegations since DOJ declined prosecution on Thursday, November 14, 2019.

7. As such, Defendant respectfully requests a two-week extension of time, until December 9, 2019, to file its responsive pleading.

